Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Amendment of Section 73.622(b)	)	
Table of Allotments	)	**MB Docket No. 02-223**
Digital Television Broadcast Stations	)	**RM-10520**
Television Broadcast Service	)	
(Avalon and Barstow, California)	)	

To: Chief, Video Services, Media Bureau

REPLY COMMENTS OF SUNBELT TELEVISION, INC.

Sunbelt Television, Inc., licensee of Station KHIZ(TV), Barstow, California, hereby submits its Reply Comments in this proceeding[1]. With respect thereto, the following is stated

The *NPRM* proposes the allotment of digital channel 47c to Avalon, California. As a counterproposal to the proposal contained in the *NPRM*, Sunbelt proposed the allotment of Channel 47c as a substitute to Channel 44 to Barstow, California. This need for change of DTV channels by Sunbelt recently has become apparent insofar as operation with its current DTV channel, DTV Channel 44, contemplates operation from KHIZ(TV)'s current transmitter site, but contrary to Longley-Rice predictions results, according to signal strength measurements performed by Sunbelt's Consulting Engineer, due to the existence of Cajon Pass, a

[1] It is noted that Federal Register publication os the NPRM did not occur until August 20, 2002. 67 Fed. Reg. 53899.

cut in the San Bernardino Mountains caused by the San Andreas Fault, the signal of KHIZ goes well beyond the San Bernardino Mountain Range, into the area served already by KXLA(TV), Channel 44 . See Attachment 1. [2] As a result, once KHIZ-DT begins operation, it is believed that KHIZ-DT (DTV Channel 44), will cause actual interference to KXLA(TV), which also operates on Channel 44 in the Los Angeles DMA (currently, pursuant to an STA, from nearby Mt. Wilson).

To eliminate this likely signal interference problem, Sunbelt searched for alternative DTV channels, and concluded in December 2001 that switching from DTV Channel 44 to DTV Channel 47 would accommodate its needs and the public interest by eliminating future interference, and conversely, that operation on that new Channel 47 would cause no interference to any existing station. At that time, Pappas Southern California License, LLC, licensee of analog station KAZA, was not entitled to a paired digital channel.

Since that time, however, Congress has intervened, and pursuant to the Public Health, Security, and Bioterrorism Preparedness and Response Act of 2002, Pappas is now entitled to a paired channel. Insofar as Pappas concluded in its Petition for Rulemaking that only Channels 29 and 47 were available for its use, and

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[2] The measurements were taken initially in conjunction with an Informal Objection filed against Application File No. BMPTTL-19960516LY, concerning service being provided by, and interference being caused to, KHIZ(TV) south of the San Gabriel and San Bernardino Mountain Ranges. As seen, the field strength measurements show that contrary to Longley-Rice prediction methods, not only does the Grade B contour of KHIZ(TV) go beyond the mountain ranges, signals from the KHIZ Quartzite Peak site also go beyond the mountains.

Channel 29 is now occupied by Station KFTR-TV, Ontario, California[3], it would appear that Channel 47, while usable by KHIZ to eliminate KHIZ's interference problem, also is uniquely usable by Pappas.

Since the filing of its Counterproposal last week, in order to eliminate the mutual exclusivity between the Sunbelt and Pappas proposals, Sunbelt has performed a further engineering study. See Attachment 2. It has been determined by Sunbelt's Consulting Engineer that DTV Channel 55 is available for assignment to Sunbelt. If Channel 55 is assigned by the Commission in lieu of requested DTV Channel 47, not only will the amended channel assignment (1) eliminate the mutual exclusivity between the Pappas and Sunbelt proposals, it also will (2) thereby eliminate future interference between KXLA(TV) analog and KHIZ-DT that will otherwise exist in the Crestline/Rialto/Skyforest areas on Channel 44. Moreover, allowing operation of Channel 55 by KHIZ in lieu of its current Channel 44 also will greatly increase the overall service area and population of the future KHIZ-DT, allowing Sunbelt to more closely replicate its current analog Grade B contour, and thereby placing KHIZ-DT more on par with other Los Angeles Market stations. 47 C.F.R. § 73.622(f)(5).

Acceptance of this alternative channel is fully in accordance with Commission rulemaking procedures. See, e.g., *Ely, Hermantown, and Pine City, MN and Siren, WI*, 12 FCC Rcd 587, ¶¶ 4, 7 (Chief, Allocations Branch 1997)

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[3] *Ontario, CA*, DA 02-1777 (July 29, 2002).

(counterproposal filed for Channel 265A at Siren, Wisconsin; in reply comments, original proponent proposes alternative allotment of Channel 289A to Siren; Channel 289 allotted); *Arnold and Columbia, CA*, 13 FCC Rcd 18894 (Chief, Policy and Rules 1998). See also, *Columbia and Dothan, AL*, 8 FCC Rcd 4496 (Chief, Allocations Branch 1993 ("[i]n response to...counterproposal [petitioner] performed a channel search to find an alternate channel for allotment to Columbia.... Channel 221A can be allotted to Columbia instead of Channel 271A"; substitution adopted).

Although Channel 55 is out of the core DTV channel span, Sunbelt is willing to accept that channel and begin operation on that channel until such time a core DTV channel becomes available. If the Commission adopts the suggested allotment of Channel 55 to Barstow, Sunbelt will amend its pending DTV application and propose operation on that channel. Further, following such grant, Sunbelt expeditiously will commence construction and begin DTV operation on that channel.

WHEREFORE, it is respectfully requested that these Reply Comments be accepted in this proceeding.

Respectfully submitted,

SUNBELT TELEVISION, INC.

By: _____
Dan J. Alpert
Its Attorney

The Law Office of Dan J. Alpert
2120 N. 21st Rd.
Suite 400
Arlington, VA 22201
(703) 243-8690

August 23, 2002

ATTACHMENT 1

ENGINEERING STATEMENT OF JOEL T. SAXBERG

I am a graduate engineer and have been in the business of providing technical consulting services since 1964. I have worked in the technical side of broadcasting since 1961. I was an employee of CBS Television Network, where I worked in telecine maintenance and director of engineering for Lotus Communications from 1974 to 1981. I founded Broadcast Engineering and Equipment Maintenance Company in 1964 and have provided equipment and consulting services for over thirty-five years.

I have been retained by Sunbelt Television, Inc. to evaluate the effects of the KSGA-LP low-power television station on full-service Station KHIZ(TV), licensed to Barstow, California. The location of the protected Grade B Contour of KHIZ(TV) and the 64 dBu Contour of Station KSGA-LP are shown on Exhibit A. Measurements locations were chosen at locations within the KHIZ(TV) Grade B Contour.

The first set of measurements were taken on January 30 and January 31, 2002. The following measurement methodology was used. A 30 foot pneumatic mast was mounted on a special bracket made for a Toyota SUV. Attached to this mast was a Potomac Instruments ANT-72 antenna with 34 feet of coaxial cable. Both the antenna and cable were calibrated by Potomac Instruments. The antenna plus cable calibration factor, in dB, was added to the Z-Technology field meter readings. This meter, Model R-507 (Serial No. 02011), was last calibrated on March 21, 2001 by the manufacturer. A Garmin GPS Receiver with a roof mount antenna was connected to a recording laptop computer along with a field strength meter. The mast was raised and oriented for maximum signal strength. The orientation of the mast was checked with a Brunton compass for orientation. In all cases, the maximum signal was in the direction of the KHIZ(TV) antenna, located at Quartzite Mountain.

Prior to beginning the KHIZ(TV) field strength measurements, it was necessary to coordinate with the licensee of KHIZ(TV). It was arranged that the KHIZ measurements would occur on January 30 and 31, 2002. Sunbelt is licensee of TV relay stations that retransmit KHIZ(TV) from Paivika Ridge. The TV relay utilized by Sunbelt has an output on Channel 64, and operates with an ERP of 0.1 kW. Its signal is oriented at 210° and has a beamwidth of 24°. It is vertically polarized. Due to the highly directional nature of the intercity relay (which is not even aimed in the direction where the majority of the measurements were being taken) and its relatively low power of operation, the amount of signal placed over the test area by the intercity relay is minimal or non-existent. Nevertheless, prior to commencement of the tests, the TV ICR was turned off.

During the time of the each of the readings, the mast on my vehicle was locked in position, the recording equipment started, and the vehicle was slowly driven in a straight line 30 meters (100 feet). At the end of each measurement set, the recording equipment was stopped and was given a file name. The laptop recorded simultaneously the field strength of the station, and GPS coordinates of the measurement location, and the time

the measurements were taken. A portable television also was brought along and used during the course of the measurements, so that a visual evaluation of the quality of the KHIZ(TV) signal could be made. The locations of the precise locations where the measurements were taken are shown in Exhibit B. As can be seen, all measurement locations chosen were fully within the KHIZ(TV) protected Grade B Contour, and within the KSGA-LP 64 dBu contour.

A table of those measurements is shown below. The results of those measurements indicate substantially different signal levels in the test areas than those predicted by Longley-Rice prediction methods. There clearly are RF paths from the upper Quartzite Mountain main transmitter location of KHIZ(TV) through Cajon Pass. Cajon Pass is a cut through the San Bernardino Mountains caused by the San Andreas Fault. The location of Cajon Pass is shown on Exhibit C. As a result, there were many locations south of Cajon Pass where regular off-air transmission of KHIZ may be viewed using typical outdoor, or at times even indoor, UHF TV antennas.

File	Meas.	Low dBuV/m	High	Median	Coordinates Start	End	Site
020130A	140	41.8	65.6	54.9	34.099383 –117.533366	34.099316 –117.532800	Fontana
020130B	110	45.8	70.3	61.2	34.099533 –117.392516	34.099533 –117.392733	Rialto
020131A	80	64.0	82.6	74.8	34.238666 –117.291233	34.238766 –117.291800	Crestline
020131B	90	56.8	78.4	70.4	34.237683 117.290166	34.237650 –117.290100	Crestline
020131C	100	51.7	78.6	67.9	34.231850 –117.206066	34.231983 -117.205616	High School
020131D	120	48.3	79.7	69.5	34.235083 –117.178300	34.235000 –117.177900	Skyforest

Two measurements were made on Crest Forest Drive, a main business street in the town of Crestline, California. At these two locations,, off-air viewing of KHIZ(TV) was possible even with an indoor, *i.e.*, "bow-tie" antenna. Along Highway 18, measurements were made at the Rim of the World High School Parking Lot and again in the Town of Skyforest. All five of these mountain locations have line-of-sight paths to Blue Mountain, the new authorized location of KSGA-LP. Based upon my analysis of the measurements, it was clear to me that KSGA-LP would cause interference to the primary signal of KHIZ(TV).

Station KSGA-LP began operations on or about August 5, 2002. On August 16, 2002, additional TV receiver observations were made at the same test locations as used previously. The weather conditions were comparable to those in existence at the time of the original testing. With KSGA-LP on the air (as verified by off-air video content), a television receiver with a VHS recorder was installed in the test vehicle, a Toyota 4-runner. An 8-element Yagi (a portion of a Radio Shack UHF Antenna) was mounted (horizontal polarization) on a thirty-foot pneumatic mast. This TV receive antenna was raised to 30 feet above ground and oriented toward Quartzite Mountain, the location of the KHIZ(TV) main transmitter. A GPS receiver was again used to provide positioning data to ensure that the same locations were used to obtain measurement date. During portions of the TV reception tests, both KHIZ and KSGA-LP were running the same program. In order to differentiate the signals, at my direction a crawl was added to the

KHIZ picture by the KHIZ licensee so a clear determination of what signal was being viewed could readily be determined.

At the test locations located at Fontana and Rialto, the KHIZ(TV) signal no longer was detectable. Even with the Yagi test antenna oriented directly toward KHIZ(TV), the KSGA-LP signal completely blocked the signal of KHIZ(TV). From those locations, I attempted to view KHIZ(TV) on my portable test television. In contrast to the reception I was able to receive from KHIZ(TV) during the previous test program, I now received nothing but those signals transmitted by KSGA-LP. Once again, all of these test locations were within the KHIZ(TV) protected Grade B Contour, and are locations where KHIZ(TV) previously achieved coverage.

As an additional test of the effect of the commencement of operations by KSGA-LP on the ability of viewers to receive KHIZ(TV), I monitored the effect of KSGA-LP on KHIZ(TV) signal from my personal residence, located at 30960 Scenic Way, Running Springs, CA. A map showing the location of my residence in relation to the KHIZ(TV) Grade B Contour is shown on Exhibit D. At my residence, I own a Mitsubishi TV, and utilize an indoor UHF antenna. I have in the past been able to receive KHIZ(TV) off-air from that residence.

On July 30, 2002, prior to the date KSGA-LP began operations, I watched KHIZ(TV) from my residence. Insofar as the location is in Running Springs, which is 98 degrees from the Sunbelt ICR and 161 degrees from KHIZ(TV), I am certain that the signal received was at all times from the KHIZ(TV) primary station as the antenna was oriented at approximately 341 degrees which corresponds to the direction of KHIZ(TV). The signal I received was very acceptable.

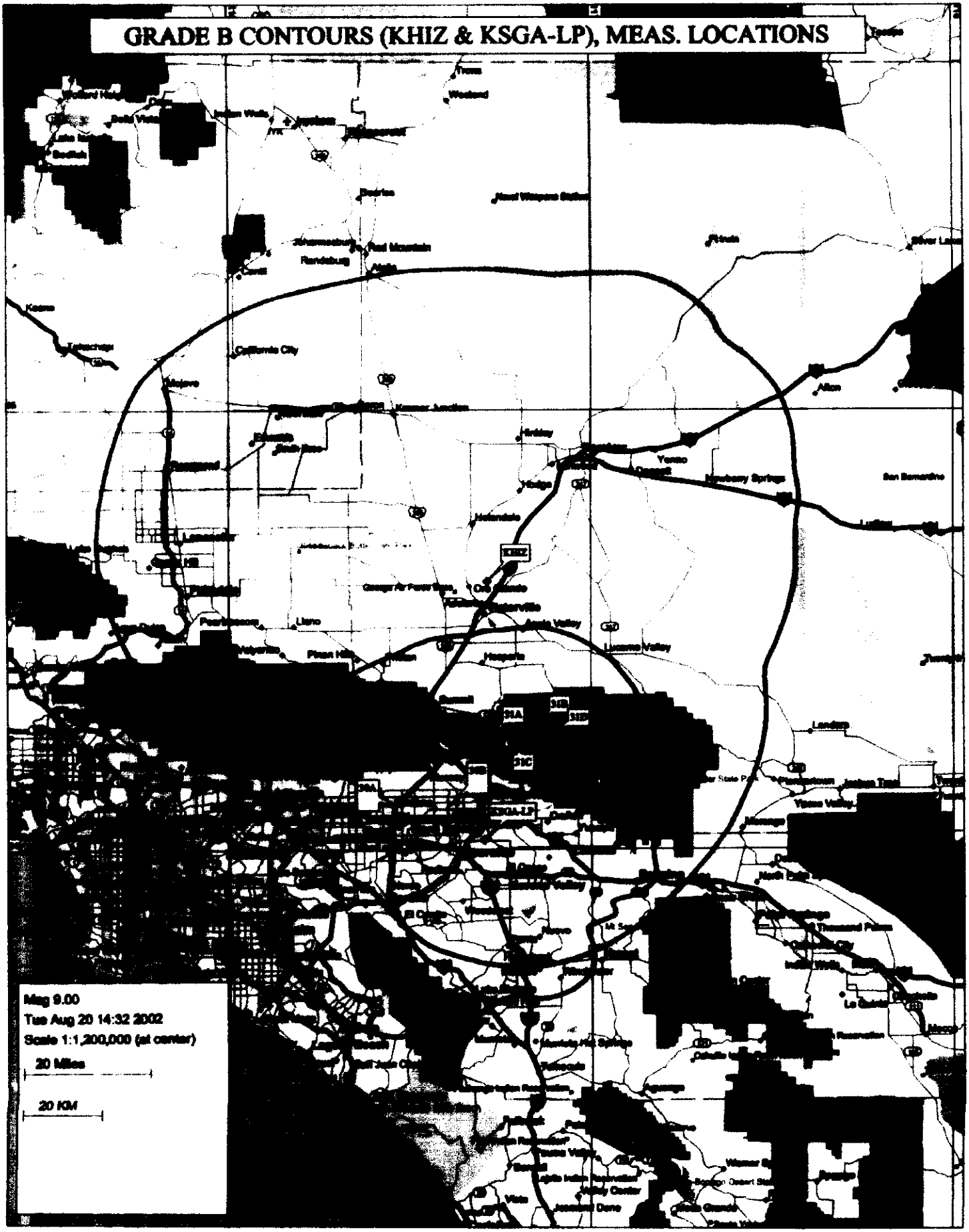
On August 19, 2002, after KSGA-LP began operations, I again used the same equipment to view KHIZ(TV). Although I was still able to view KHIZ(TV), the signal had deteriorated insofar as interference lines appear during reception of KHIZ(TV), thereby degrading the picture that is received. Picture quality before KSGA-LP began operating was "A-B," it is now "C-D," "A" being best, and "D" being inferior.

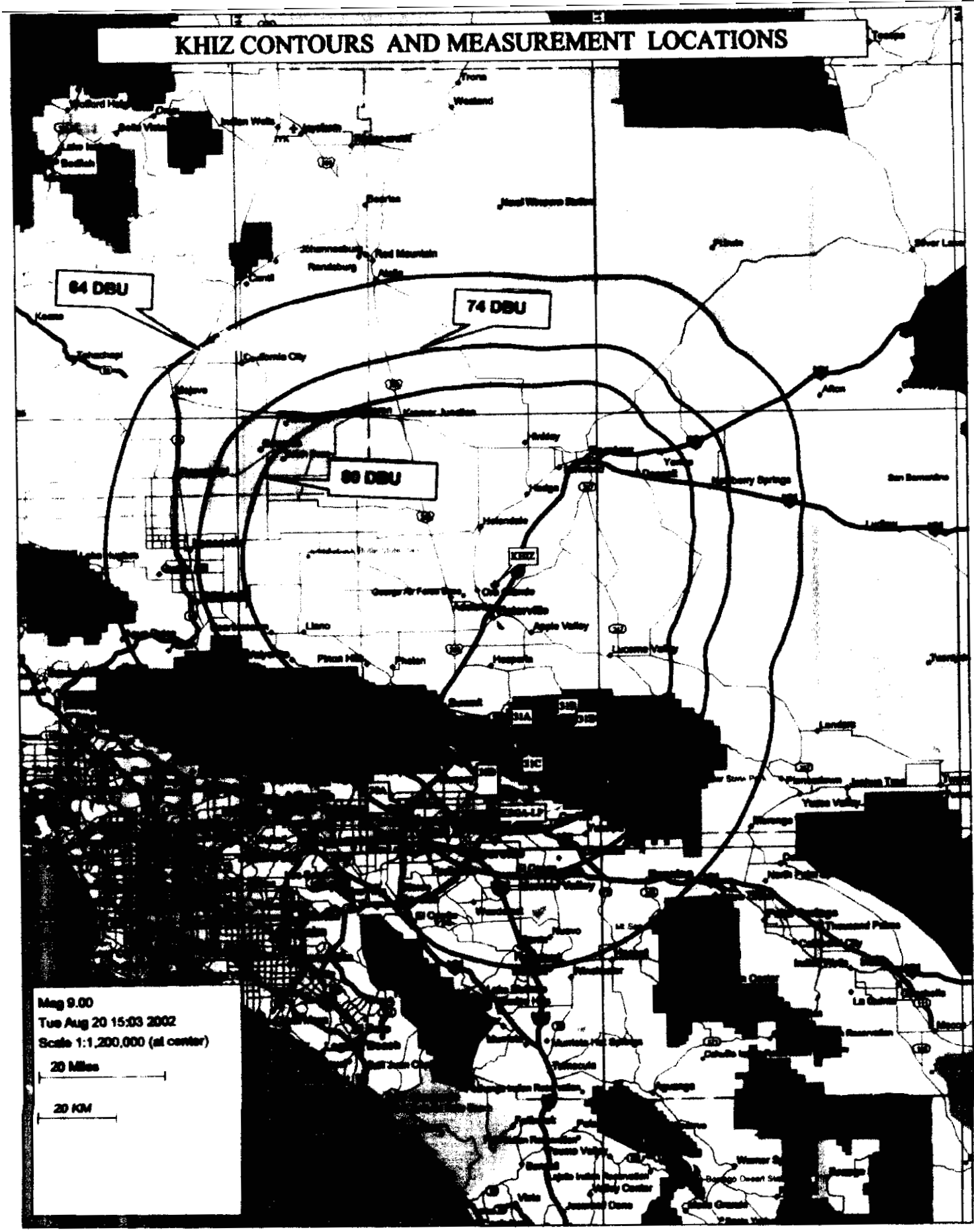
From the foregoing, even using a common retail residential receiver and antenna, it is clear and obvious that KSGA-LP is causing actual interference to off-air viewing of the primary signal of KHIZ(TV) in areas within the protected Grade B Contour of KHIZ(TV).

I declare under penalty of perjury that the forgoing is true and correct.

Joel Saxberg
Consulting Radio Engineer

August 20, 2002


GRADE B CONTOURS (KHIZ & KSGA-LP), MEAS. LOCATIONS
Mag 9.00
Tue Aug 20 14:32 2002
Scale 1:1,200,000 (at center)
20 Miles
20 KM
KHIZ
KSGA-LP


KHIZ CONTOURS AND MEASUREMENT LOCATIONS
64 DBU
74 DBU
80 DBU
KHIZ
Mag 9.00
Tue Aug 20 15:03 2002
Scale 1:1,200,000 (at center)
20 Miles
20 KM

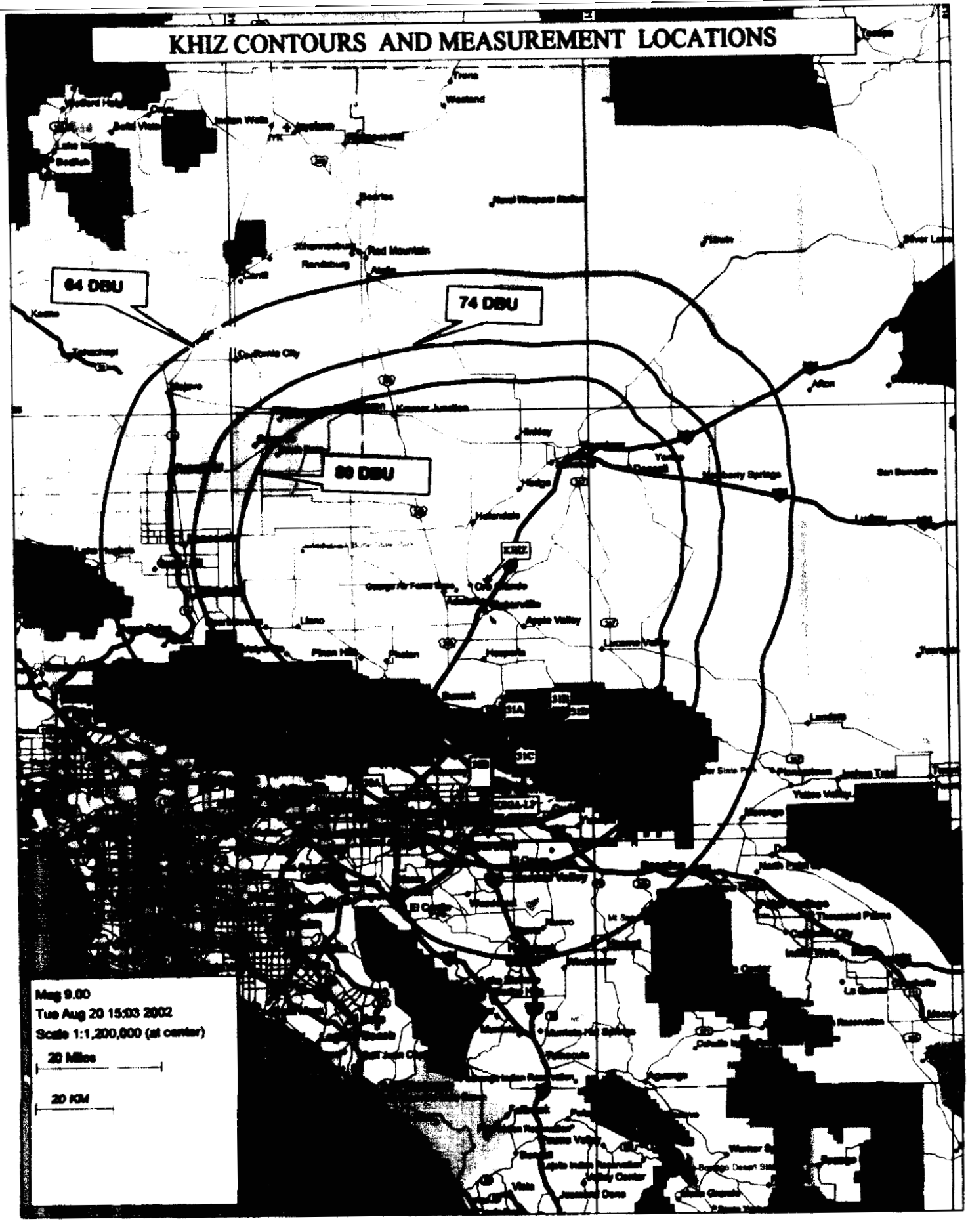
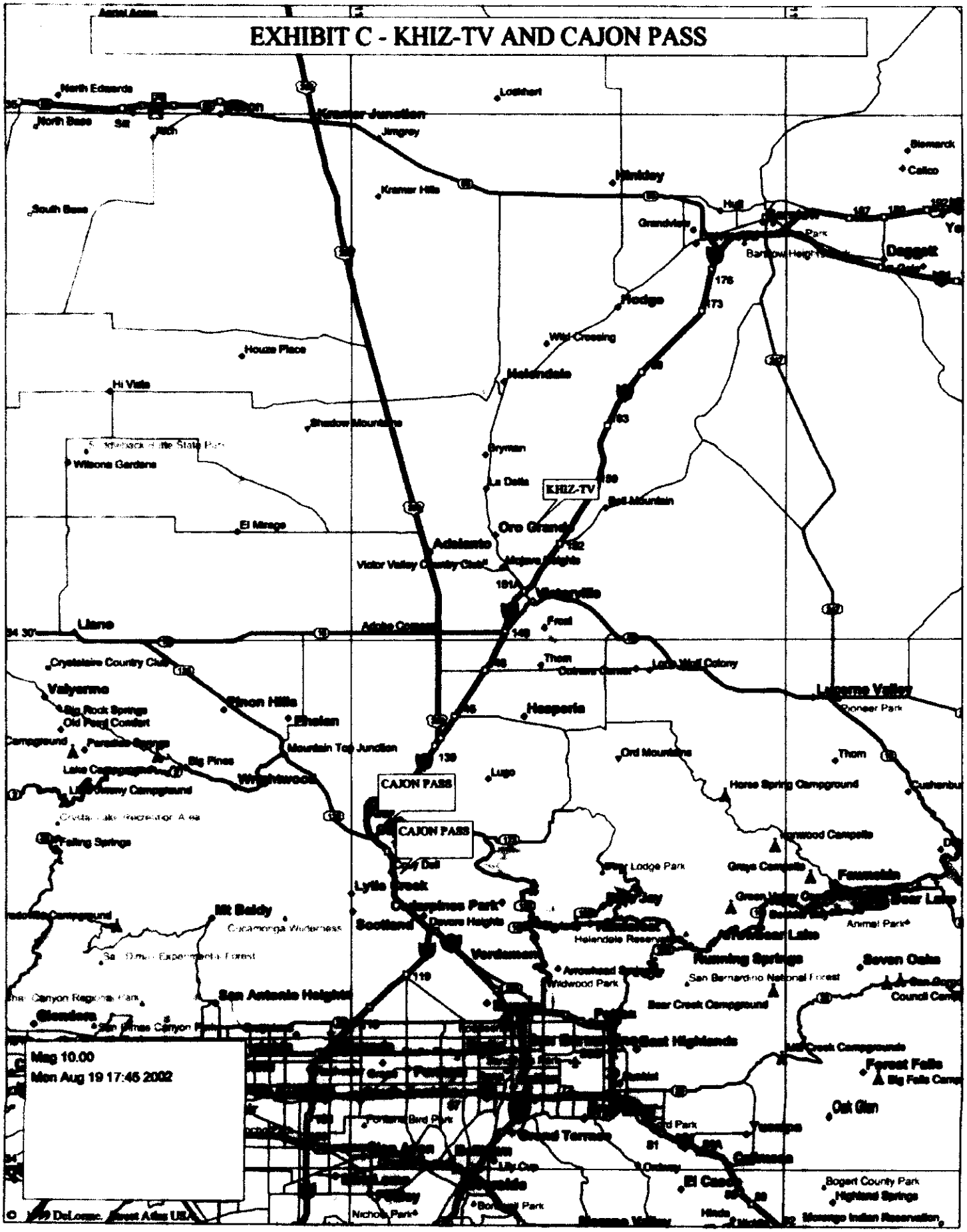
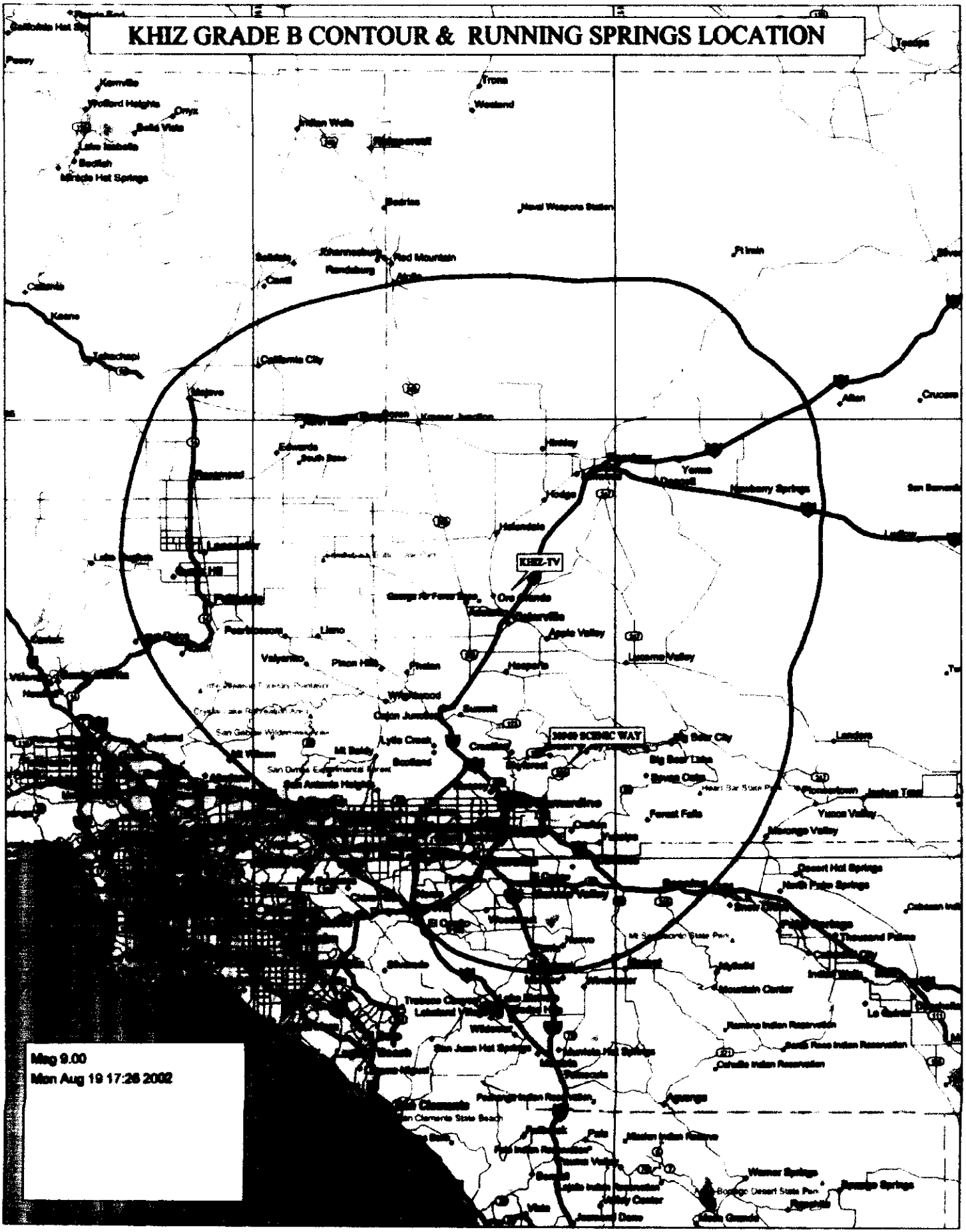

KHIZ CONTOURS AND MEASUREMENT LOCATIONS
64 DBU
74 DBU
69 DBU
KHIZ
Mag 9.00
Tue Aug 20 15:03 2002
Scale 1:1,200,000 (at center)
20 Miles
20 KM

EXHIBIT C - KHIZ-TV AND CAJON PASS



KHIZ GRADE B CONTOUR & RUNNING SPRINGS LOCATION



ATTACHMENT 2

ENGINEERING STATEMENT
REPLY COMMENTS IN SUPPORT OF
PETITION FOR RULE MAKING
MB DOCKET 02-223 RM-10520
SECTION 73.622 OF THE FCC RULES
TO CHANGE DTV CHANNEL
ON BEHALF OF
SUNBELT TELEVISION, INC.
KHIZ-DT, BARSTOW, CALIFORNIA

AUGUST 2002

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

This engineering statement has been prepared on behalf of Sunbelt Television, Inc., licensee of Television Station KHIZ-TV, NTSC Channel 64, Barstow, California. This engineering statement is in support of reply comments in MB Docket 02-223, RM-10520, released August 7, 2002. It is proposed to change the current digital television channel allotment contained in Section 73.622 of the FCC Rules from UHF Channel 44 to UHF Channel 55 with an ERP of 156 kW. 156 kW is the maximum ERP in UHF-DT, Zone II for the proposed HAAT of 920 meters. Shown in Figure E-1, the resulting service area encompasses the entire community of license.

This request is supported by an analysis of the impact of this proposal on other authorized NTSC stations, DTV stations, and other proposed DTV allotment changes. An allocation analysis has been performed using the Federal Communications Commission OET Bulletin 69 dated July 2, 1997 and the FCC supplemental processing guidelines dated August 1998. The analysis was performed by using the FCC Longley-Rice model adapted for use for an INTEL computer. The results of this adapted program have been compared to other known FCC studies and have been found to give comparable results.

Existing DTV Table of Allotments, Page B-3[1]

DTV Channel	Effective Radiated Power (kW)	Height Above Average Terrain (meters)	Radiation Center AMSL (meters)
44	70.2	518	1429

[1] In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service", MM Docket No. 87-268, Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order (FCC 98-24), 2/12/98.

Allotment Coordinates NAD-27

North Latitude: 34° 36' 34"
West Longitude: 117° 17' 11"

Proposed DTV Facilities

DTV Channel	Effective Radiated Power (kW)	Height Above Average Terrain (meters)	Radiation Center AMSL (meters)
55	156	920	2600

Proposed Coordinates NAD-27

North Latitude: 34° 21' 08"
West Longitude: 117° 40' 27"

Table 1 shows the stations to be considered according to the processing guidelines[2]. None of these stations exceed the allowed cumulative interference level of 10%. Stations not shown in the table are presumed to have zero or much less than de-minimis interference. See Table 2.

Therefore, it is believed that the request for DTV channel is consistent with the FCC Rules.

[2] "Additional Application Processing Guidelines for Digital Television (DTV)", Public Notice 84889 (August 10, 1998).

COHEN, DIPPELL AND EVERIST, PC

TABLE I
POTENTIAL INTERFEREES OF
KHIZ-DT, BARSTOW, CALIFORNIA
CHANNEL 55, 156 KW, 920 METERS
AUGUST 2002

Channel	Call	City/State	Dist(km)	Status	File Number	New Interference
40	KDFX-LP	INDIO, ETC. CA	173.9	LIC	BLTTL -19990219JC	0.00%
40	KTBN-TV	SANTA ANA CA	38.4	LIC	BLCT -19830418KH	0.00%
41	KVMM-LP	SANTA BARBARA CA	184.1	CP	BPTTL -20010116AFP	0.00%
48	KHTV-LP	INLAND EMPIRE CA	38.8	LIC	BLTTL -20010507AAM	0.00%
52	KVEA	CORONA CA	38.4	LIC	BLCT -19960805KF	0.00%
52	KVEA	CORONA CA	38.8	APP	BPCT -20011217ABM	0.00%
54	KAZA-TV	AVALON CA	38.6	LIC	BLCT -20010712AGN	0.00%
55	KUVI	BAKERSFIELD CA	155.0	CP	BPCDT -19991028AEU	0.03%
55	KUZZ-DT	BAKERSFIELD CA	155.0	PLN	DTVPLN-DTVP1488	0.10%
55	KFMB-TV	SAN DIEGO CA	172.8	LIC	BLCDT -20000302AAK	0.00%
55	KFMB-TV	SAN DIEGO CA	172.8	CP	BPCDT -20000501ADY	0.23%
55	KFMB-DT	SAN DIEGO CA	172.8	PLN	DTVPLN-DTVP1490	1.68%
56	KDOC-TV	ANAHEIM CA	18.5	LIC	BLCT -19821028KF	0.26%
56	KDOC-TV	ANAHEIM CA	38.6	CP	BPCT -19990324KE	0.08%
57	KJLA	VENTURA CA	123.8	LIC	BLCT -20000323ABW	0.00%
58	KLCS	LOS ANGELES CA	38.4	LIC	BLET -347	0.00%
58	KLCS	LOS ANGELES CA	38.4	CP	BPET -20011022ABE	0.00%
62	KRCA	RIVERSIDE CA	18.4	LIC	BLCT -19920427KF	0.00%
62	KRCA	RIVERSIDE CA	38.7	CP MOD	BMPCT -20000419ABV	0.00%
63	KADY-TV	OXNARD CA	123.8	LIC	BLCT -20000328AHH	0.00%

Source: FCC CDBS 8/23/2002

COHEN, DIPPELL AND EVERIST, PC

TABLE 2

TV INTERFERENCE and SPACING ANALYSIS SUMMARY

Date: 08-22-2002 Time: 16:29:33

Record Selected for Analysis

KHIZ-P OTHER -RMG522 BARSTOW CA US
Channel 55 ERP 157 kW HAAT 0 m RCAMSL 02600 m
Latitude 34 -21-8 Longitude 117 -40-27
Status APP Zone 2 Border
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility meets maximum height/power limits

No Spacing violations or contour overlap to Class A stations

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility is beyond the Canadian coordination distance

Proposed facility is within the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application Ref. No.
40	KDFX-LP	INDIO, ETC. CA	BLTTL -19990219JC

Total scenarios = 1

Scenario 1 % New Interference 0.00 OK

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Analysis of Interference to Affected Station 2

NTSC Baseline Analysis

Channel	Call	City/State	Application Ref. No.
40	KTBNTV	SANTA ANA CA	DTVPLN -NPLN0268

Analysis of current record

Channel	Call	City/State	Application Ref. No.
40	KTBN-TV	SANTA ANA CA	BLCT -19830418KH

Proposal causes no interference

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
41	KVMM-LP	SANTA BARBARA CA	BPTTL -20010116AFP

Total scenarios = 2

Scenario 1 % New Interference 0.00 OK

Scenario 2 % New Interference 0.00 OK

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application Ref. No.
48	KHTV-LP	INLAND EMPIRE CA	BLTTL -20010507AAM

Proposal causes no interference

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Analysis of Interference to Affected Station 5

NTSC Baseline Analysis

Channel	Call	City/State	Application Ref. No.
52	KVEA	CORONA CA	DTVPLN -NPLN0186

Analysis of current record

Channel	Call	City/State	Application Ref. No.

52 KVEA CORONA CA BLCT -19960805KF

Proposal causes no interference

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Analysis of Interference to Affected Station 6

Analysis of current record
Channel Call City/State Application Ref. No.
52 KVEA CORONA CA BPCT -20011217ABM

Proposal causes no interference

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Analysis of Interference to Affected Station 7

NTSC Baseline Analysis
Channel Call City/State Application Ref. No.
54 NEW AVALON CA DTVPLN -NPLN0188

Analysis of current record
Channel Call City/State Application Ref. No.
54 KAZA-TV AVALON CA BLCT -20010712AGN

Total scenarios = 6

Scenario 1 % New Interference 0.00 OK

Scenario 2 % New Interference 0.00 OK

Scenario 3 % New Interference 0.00 OK

Scenario 4 % New Interference 0.00 OK

Scenario 5 % New Interference 0.00 OK

Scenario 6 % New Interference 0.00 OK

##

Analysis of Interference to Affected Station 8

DTV Baseline Analysis
Channel Call City/State Application Ref. No.

55 KUZZ-DT BAKERSFIELD CA DTVPLN -DTVP1488

NTSC Baseline Analysis
Channel Call City/State Application Ref. No.
45 KUZZTV BAKERSFIELD CA DTVPLN -NPLN0178

Analysis of current record
Channel Call City/State Application Ref. No.
55 KUVI BAKERSFIELD CA BPCDT -19991028AEU

Total scenarios = 1

Scenario 1 % New Interference 0.03 OK

##########

Analysis of Interference to Affected Station 9

Analysis of current record
Channel Call City/State Application Ref. No.
55 KUZZ-DT BAKERSFIELD CA DTVPLN -DTVP1488

Total scenarios = 1

Scenario 1 % New Interference 0.10 OK

##########

Analysis of Interference to Affected Station 10

DTV Baseline Analysis
Channel Call City/State Application Ref. No.
55 KFMB-DT SAN DIEGO CA DTVPLN -DTVP1490

NTSC Baseline Analysis
Channel Call City/State Application Ref. No.
8 KFMBTV SAN DIEGO CA DTVPLN -NPLN0120

Analysis of current record
Channel Call City/State Application Ref. No.
55 KFMB-TV SAN DIEGO CA BLCDT -20000302AAK

Station is "Checklist Like" no further analysis required

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Analysis of Interference to Affected Station 11

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
55	KFMB-TV	SAN DIEGO CA	BPCDT	-20000501ADY

Total scenarios = 1

Scenario 1 % New Interference 0.23 OK

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Analysis of Interference to Affected Station 12

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
55	KFMB-DT	SAN DIEGO CA	DTVPLN	-DTVP1490

Total scenarios = 1

Scenario 1 % New Interference 1.68 OK

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Analysis of Interference to Affected Station 13

NTSC Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
56	KDOCTV	ANAHEIM CA	DTVPLN	-NPLN0190

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
56	KDOC-TV	ANAHEIM CA	BLCT	-19821028KF

Total scenarios = 48

Scenario 1 % New Interference 0.26 OK

Scenario 2 % New Interference 0.26 OK

Scenario 3 % New Interference 0.26 OK

Scenario 4 % New Interference 0.26 OK

Scenario 5 % New Interference 0.26	OK
Scenario 6 % New Interference 0.26	OK
Scenario 7 % New Interference 0.26	OK
Scenario 8 % New Interference 0.26	OK
Scenario 9 % New Interference 0.26	OK
Scenario 10 % New Interference 0.26	OK
Scenario 11 % New Interference 0.26	OK
Scenario 12 % New Interference 0.26	OK
Scenario 13 % New Interference 0.26	OK
Scenario 14 % New Interference 0.26	OK
Scenario 15 % New Interference 0.26	OK
Scenario 16 % New Interference 0.26	OK
Scenario 17 % New Interference 0.26	OK
Scenario 18 % New Interference 0.26	OK
Scenario 19 % New Interference 0.26	OK
Scenario 20 % New Interference 0.26	OK
Scenario 21 % New Interference 0.26	OK
Scenario 22 % New Interference 0.26	OK
Scenario 23 % New Interference 0.26	OK
Scenario 24 % New Interference 0.26	OK
Scenario 25 % New Interference 0.26	OK
Scenario 26 % New Interference 0.26	OK
Scenario 27 % New Interference 0.26	OK
Scenario 28 % New Interference 0.26	OK

Scenario 29 % New Interference	0.26	OK
Scenario 30 % New Interference	0.26	OK
Scenario 31 % New Interference	0.26	OK
Scenario 32 % New Interference	0.26	OK
Scenario 33 % New Interference	0.26	OK
Scenario 34 % New Interference	0.26	OK
Scenario 35 % New Interference	0.26	OK
Scenario 36 % New Interference	0.26	OK
Scenario 37 % New Interference	0.26	OK
Scenario 38 % New Interference	0.26	OK
Scenario 39 % New Interference	0.26	OK
Scenario 40 % New Interference	0.26	OK
Scenario 41 % New Interference	0.26	OK
Scenario 42 % New Interference	0.26	OK
Scenario 43 % New Interference	0.26	OK
Scenario 44 % New Interference	0.26	OK
Scenario 45 % New Interference	0.26	OK
Scenario 46 % New Interference	0.26	OK
Scenario 47 % New Interference	0.26	OK
Scenario 48 % New Interference	0.26	OK

##

Analysis of Interference to Affected Station 14

Analysis of current record

Channel	Call	City/State	Application Ref. No.
56	KDOC-TV	ANAHEIM CA	BPCT -19990324KE

Total scenarios = 6

Scenario 1 % New Interference 0.08 OK

Scenario 2 % New Interference 0.08 OK

Scenario 3 % New Interference 0.08 OK

Scenario 4 % New Interference 0.08 OK

Scenario 5 % New Interference 0.08 OK

Scenario 6 % New Interference 0.08 OK

##

Analysis of Interference to Affected Station 15

NTSC Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
57	KSTVTV	VENTURA CA	DTVPLN	-NPLN0283

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
57	KJLA	VENTURA CA	BLCT	-20000323ABW

Proposal causes no interference

##

Analysis of Interference to Affected Station 16

NTSC Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
58	KLCS	LOS ANGELES CA	DTVPLN	-NPLN0192

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
58	KLCS	LOS ANGELES CA	BLET	-347

Proposal causes no interference

##

Analysis of Interference to Affected Station 17

Analysis of current record

Channel	Call	City/State	Application Ref. No.
58	KLCS	LOS ANGELES CA	BPET -20011022ABE

Proposal causes no interference

##########

Analysis of Interference to Affected Station 18

NTSC Baseline Analysis

Channel	Call	City/State	Application Ref. No.
62	KRCA	RIVERSIDE CA	DTVPLN -NPLN0195

Analysis of current record

Channel	Call	City/State	Application Ref. No.
62	KRCA	RIVERSIDE CA	BLCT -19920427KF

Proposal causes no interference

##########

Analysis of Interference to Affected Station 19

Analysis of current record

Channel	Call	City/State	Application Ref. No.
62	KRCA	RIVERSIDE CA	BMPCT -20000419ABV

Proposal causes no interference

##########

Analysis of Interference to Affected Station 20

NTSC Baseline Analysis

Channel	Call	City/State	Application Ref. No.
63	KADYTV	OXNARD CA	DTVPLN -NPLN0196

Analysis of current record

Channel	Call	City/State	Application Ref. No.
63	KADY-TV	OXNARD CA	BLCT -20000328AHH

Proposal causes no interference

##########

Analysis of Interference to Affected Station 21

Analysis of current record

Channel	Call	City/State	Application Ref. No.
55	KHIZ-P	BARSTOW CA	OTHER -RMG522

##

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

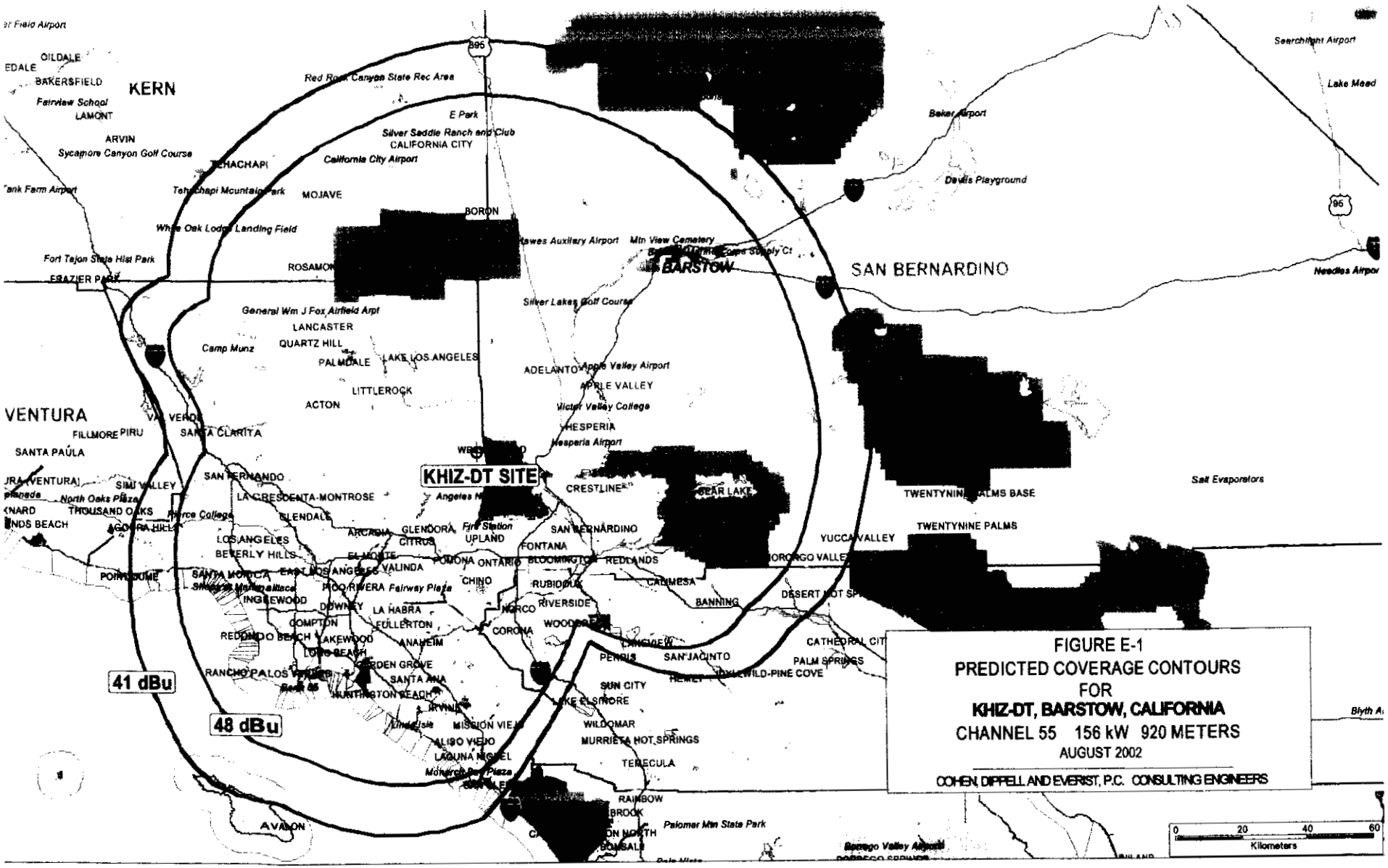


FIGURE E-1
PREDICTED COVERAGE CONTOURS
FOR
KHIZ-DT, BARSTOW, CALIFORNIA
CHANNEL 55 156 kW 920 METERS
AUGUST 2002

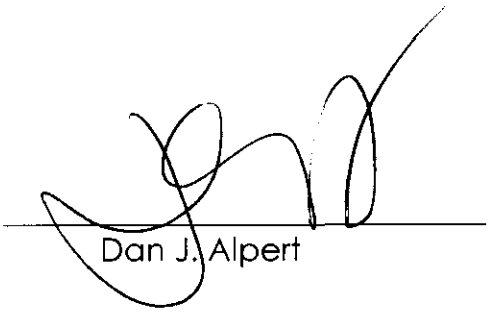
COHEN, DIPPELL AND EVERIST, P.C. CONSULTING ENGINEERS

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that on August 23, 2002, a true and correct copy of the foregoing Comments are being served upon the following by Hand Delivery:

John Griffith Johnson, Jr., Esq.
Paul Hastings Janofsky & Walker, LLP
1299 Pennsylvania Ave., N.W.
10th Floor
Washington, DC 20004-2400

John Butcher, Esq.
Thompson Hine & Flory LLP
1920 N Street, N.W.
Suite 800
Washington, DC 20036



Dan J. Alpert